REMARKS

Reconsideration of this application as amended is respectfully requested.

In the Office Action dated July 6, 2006, claims 1-35 were pending. Claims 1-34 were rejected. Claim 35 was objected to, but would be allowable if rewritten in an independent form. In this response, claims 1, 10, 15, 19, 22, 27 and 35 have been amended. New claim 36 has been added. No claims are canceled. No new matter has been added. Support for the amendments can be found throughout the specification as filed. Applicant reserves all rights with respect to the applicability of the Doctrine of Equivalents.

Amendments

Rejections under 35 U.S.C. § 102(e)

Claims **1, 3, 4, 8, 22, 24, 33 and 34**

Claims 1, 3, 4, 8, 22, 24, 33 and 34 stand rejected under 35 U.S.C. §102(e) as being anticipated by Li, US Patent Application Publication No. 2002/0059161 (hereinafter "Li"). Applicant hereby reserves the right to swear behind Li at a later date. However, applicant respectfully submits that applicant's claims 1, 3, 4, 8, 22, 24, 33 and 34, as amended, are not anticipated by the reference.

Specifically, for example, independent claim 1, as amended, recites:

> "receiving a search term for a query;
> searching <u>a network of concept terms</u> for terms related to the search term,
>> wherein the network of concept terms is <u>associated with a subject matter domain having a plurality of predetermined relevant terms,</u>
>> wherein <u>each related term and the search term appear together in at least one sentence in a web page</u> residing on websites located on servers connected to, and wherein <u>the web page includes at least one of the relevant terms;</u>
> reformulating the query using the search term and the related terms before
>> performing a search for documents based on the search term;

searching a local database for data terms that match the search term and the
related terms, wherein the data terms are generated based on occurrence
frequencies within a document residing on the websites; and
in response to matching data terms with the search terms and related terms
corresponding to the data terms, retrieving the documents from the
respective websites"

(Emphasis added)

Applicant's amended claim 1 includes the limitations of a related term in a network of concept
terms and a search term appearing together in at least one sentence in a web page including at
least one of predetermined relevant terms of a subject matter domain associated with the
network of concept terms. It is respectfully submitted that the above limitations are absent
from Li

Rather, Li teaches a technique for efficient indexing and processing support for query
expansion (Li, [0034], Fig. 12). In Li, query expansion is based on expanding query words on
semantic similarity and syntactic relationships (Li, [0038]). Li also discloses syntactic
relationships are determined from the document collection using word co-occurrence
information to relate two words syntactically (Li, [0038]). Li describes syntactically co-
occurring words are words co-occurring in the same document above a certain frequency (Li,
[0006]). Apparently, two words in a document can be co-occurring in Li even though they do
not belong to the same sentence. However, Li is completely silent about a related term in a
network of concept terms and a search term appearing together in at least one sentence in a
web page including at least one of predetermined relevant terms of a subject matter domain
associated with the network of concept terms.

In order to anticipate a claim, each and every limitation of the claim must be taught by
the cited reference. It is respectfully submitted that Li fails to disclose the limitations set forth
above. Therefore, it is respectfully submitted that independent claim 1, as amended, is not
anticipated by Li.

Independent claim 22, as amended, includes similar limitations as noted above.
Therefore, for at least the similar reasons as discussed above, it is respectfully submitted that
claim 22, as amended, is not anticipated by Li.

Given that claims 3, 4, 8, 24, 33 and 34 depend from and include all limitations of one of independent claims 1 and 22, as amended, applicant respectfully submits that claims 3, 4, 8, 24, 33 and 34 are not anticipated by Li.

Rejections under 35 U.S.C. § 103(a)
Claims **2, 5, 10-18, 23 and 27-30**

Claims 2, 5, 10-18, 23 and 27-30 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Li in view of Bowman et al., US Patent No. 6,006,225 (hereinafter "Bowman"). However, applicant respectfully submits that applicant's claims 2, 5, 10-18, 23 and 27-30, as amended, is patentable over the cited references.

Independent claims 10, 15, 22 and 27, as amended, include limitations similar to those recited in claim 1, as amended. Claims 2-5 depend from independent claim 1, as amended, claims 11-14 depend from independent claim 10, as amended, claims 16-18 depend from independent claim 15, as amended, claim 23 depends from independent claim 22, as amended, and claims 28-30 depend from independent claim 27, as amended. Therefore, claims 2, 5, 10-18, 23 and 27-30 include, directly or indirectly the limitations set forth above. It is respectfully submitted that Li, for the reasons similar to those stated above, and Bowman, individually or in combination, fail to disclose or suggest the above noted limitations.

Rather, Bowman teaches a method for generating related query terms using a history of queries submitted to a search engine by a community of users. Specifically, Bowman describes a process that identifies from daily query log file all multiple-term queries and correlates a query term to related terms that were used with the query term in a particular query. (Bowman, col. 9, lines 38-56). Nowhere in Bowman discloses a related term in a network of concept terms and a search term appearing together in at least one sentence in a web page including at least one of predetermined relevant terms of a subject matter domain associated with the network of concept terms.

Moreover, Bowman states that related query terms generated using contents are frequently of little or no value to the search refinement process (Bowman, col. 1 line 60 – col.

2, line 37). Hence, Bowman teaches away from a related term and the search term appearing together in at least one sentence in a web page.

Further, Bowman discloses a technique for a search engine to suggest related terms to the user to allow the user to <u>refine a search</u>. Li, on the other hand, attempts to deal with the problem on word mismatch in information retrieval for <u>increasing the chance of matching words</u> in relevant document. Clearly, Li and Bowman address completely different issues. There is neither suggestion nor motivation to combine the teachings of Li and Bowman.

As such, not only do Li and Bowman not disclose, individually or in combination, all limitations of claims 1, 10, 15, 22 and 27, as amended, but the references, considered as a whole, do not suggest the desirability and thus the obviousness of making the combination. It would be impermissible hindsight to combine Li with Bowman based on applicant's own disclosure. Even if they were combined, such a combination still lacks the limitations set forth above.

Therefore, for at least the above stated reasons, it is respectfully submitted that independent claims 1, 10, 15, 22, 27 and dependent claims 2, 5, 11-14, 16-18, 23 and 28-30 are patentable over the cited references. Withdrawal of the rejections is respectfully requested.

Rejections under 35 U.S.C. § 103(a)
<u>Claims **6, 7, 9, 19-21, 25, 26, 31 and 32**</u>

Claims 6, 7, 9, 19-21, 25, 26, 31 and 32 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Li in view of Bowman in further view of Braden-Harder et al., US Patent No. 5,933,822 (hereinafter "Braden"). However, applicant respectfully submits that applicant's claims 6, 7, 9, 19-21, 25, 26, 31 and 32, as amended, are patentable over the cited references.

Independent claims 19 and 22, as amended, includes limitations similar to those recited in claim 1, as amended. Claims 6-7, 9 and 31-32 depend from independent claim 1, as amended, claims 20-21 depend from independent claim 19, as amended, claims 25 and 26

depend from independent claim 22, as amended. Therefore, claims 6-7, 9, 19-21, 25-26 and 31-32 include, directly or indirectly the limitations set forth above. It is respectfully submitted that Li, Bowman, for the reasons similar to those stated above, and Braden, individually or in combination, fail to disclose or suggest the limitations set forth above.

Braden teaches a method involving production, comparison and weighting of matching logical forms respectively associated with a search query and each of the retrieved documents (Braden, col. 5, lines 8-11). Each logical form for a sentence encodes semantic relationships between words in a linguistic phrase in that sentence (Braden, col. 7, lines 50-53). However, Braden neither discloses nor suggests a related term in a network of concept terms and a search term appearing together in at least one sentence in a web page including at least one of predetermined relevant terms of a subject matter domain associated with the network of concept terms.

Moreover, for similar reasons as stated above, Bowman teaches away from a related term and the search term appearing together in at least one sentence in a web page

Further, Li deals with the problem on word mismatch in information retrieval for increasing the chance of matching words in relevant document. Bowman discloses a technique for a search engine to suggest related terms to the user to allow the user to refine a search. Braden, on the other hand, attempts to utilize natural language processing to process results retrieved by an information retrieval engine in order to improve overall precision. Clearly, Li, Braden and Bowman address completely different issues. There is neither suggestion nor motivation to combine the teachings of Li, Braden and Bowman.

As such, not only do Li, Bowman and Braden not disclose, individually or in combination, all limitations of claims 1, 19 and 22, as amended, but the references, considered as a whole, do not suggest the desirability and thus the obviousness of making the combination. It would be impermissible hindsight to combine Li, Bowman and Braden based on applicant's own disclosure. Even if they were combined, such a combination still lacks the limitations set forth above.

Therefore, for the above stated reasons, it is respectfully submitted that claims 6-7, 9, 19-21, 25-26, and 31-32 are patentable over the cited references. Withdrawal of the rejections is respectfully requested.

Allowed Subject Matter

Applicant notes with appreciation the Examiner's indication that claim 35 would be allowable if rewritten to overcome the rejection under 35 USC, 112, 2nd paragraph and to include all of the limitations of the base claim and any intervening claims. Applicant would respectfully like to thank the Examiner for recognizing the allowability of such claim.

Accordingly, claim 35, as amended, has been rewritten as an independent claim including all limitations of its base and intervening claims. Applicant respectfully submits that claim 35, as amended, complies with the requirements of 35 USC, 112, 2nd paragraph. New claim 36 has been added to include limitations similar to those of claim 35, as amended.

Therefore, it is respectfully submitted that claim 35, as amended, and new claim 36 are both allowable.
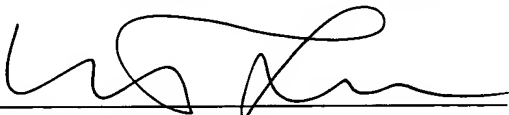
CONCLUSION

In view of the foregoing, applicant respectfully submits that the applicable objections and rejections have been overcome. If the Examiner believes a telephone conference would expedite or assist in the allowance of the present application, the Examiner is invited to call the undersigned attorney at (408) 720-8300.

Please charge Deposit Account No. 02-2666 for any shortage of fees in connection with this response.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN

Date: ___10-6-06___

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